

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR COMPLAINT AND ARREST WARRANT**

I, Manuel Figueroa-Lopez, being first duly sworn, hereby depose and state as follows:

AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) assigned to the San Juan Field Office, where I investigate misuse of the postal system, including narcotics and illegal firearms trafficking utilizing the U.S. Mail. I have been employed by the USPIS in the Miami Division's San Juan Field Office since September 2024 and have been a sworn law enforcement officer since February of 2021. I am an "investigative or law enforcement officer" within the meaning Title 18, U.S.C. Section 2510(7). That is, I am an officer of the United States who is empowered by law to conduct investigations and to make arrests for crimes furthered through the use of the U.S. Mail or in connection to the U.S. Postal Service (USPS), property of the USPS, and other postal offenses, as set forth in 18 U.S.C. § 3061. Prior to my tenure with the USPIS, I served as a Special Agent with the United States Secret Service (USSS) from February 2021 to January 2024, where I investigated financial crimes and conducted protective operations. I also worked as a Special Agent with Customs and Border Protection's Office of Professional Responsibility (CBP-OPR) from January 2024 to September 2024 investigating misconduct within CBP. I completed the Federal Law Enforcement Training Center (FLETC) Criminal Investigator Training Program (CITP) and the USSS Special Agent Training Course (SATC), which made me familiar with methods used by individuals to conceal evidence of criminal activity.

2. I am currently assigned to the USPIS Contraband Interdiction and Investigation (CI2) Team and am primarily responsible for investigations involving the illegal use of the U.S. Mail in the trafficking of narcotics and firearms. As a result, I have conducted investigations involving the transportation of firearms and controlled substances, as well as those involving proceeds derived from the distribution of firearms and controlled substances via the U.S. Mail, in violation of 18 U.S.C. §§ 922 (a)(1)(A) & (a)(3), and 1715, and 21 U.S.C. §§ 841 (a)(1), 843(b), and 846. As a Postal Inspector, I have worked on investigations

involving the use of the mail and the Postal Service to launder and smuggle currency derived from specified unlawful activities, including narcotics distribution, in violation of 18 U.S.C. §§ 981, 982, 1956, and 1957, and 31 U.S.C. § 5325. I have also participated in various interdiction operations targeting parcels containing illegal firearms, narcotics, and proceeds thereof.

3. This affidavit contains information necessary to support the probable cause for an arrest warrant and criminal complaint in case of Lillian Melisa Velez-Loarte ("**VELEZ-LOARTE**"). On or about January 6 to January 23, 2025, the defendant herein did knowingly and intentionally, combine, conspire, and agree with others, known and unknown, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute a detectable amount of a mixture and substance containing cocaine, a Schedule II, Narcotic Drug Controlled Substance, and 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II, Narcotic Drug Controlled Substance, all in violation of 21 U.S.C. §§ 841(a)(1) and 846.

4. Furthermore, between January 6 and January 23, 2025, the defendant did aid and abet in the manufacturing, distribution, or dispensing, or possession with intent to manufacture, distribute, or dispense, a controlled substance, specifically 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl), a Schedule II, Narcotic Drug Controlled Substance, in violation of 21 U.S.C. § 841.

5. Because this affidavit is submitted for the limited purpose of demonstrating probable cause, I have not included each and every fact observed by me or known to the government concerning this investigation. I have set forth only the facts believed necessary to establish probable cause that **VELEZ-LOARTE** committed violations of 21 U.S.C. §§ 841(a)(1) and 846.

PROBABLE CAUSE

6. On January 13, 2025, U.S. Postal Service Priority Express Mail Parcel EL 694 875 673 US, hereinafter the "Subject Parcel", was removed from the mail stream by Postal

Inspectors in San Juan, PR. The label on the Subject Parcel depicted the Subject Parcel was mailed from: "Bronx, NY 10451", and addressed to: "Lilliam [sic], PROYECTO VILLA EDIF G APT 93, Fajardo, PR 00738"¹.

7. On January 16, 2025, Inspectors executed a Federal Search Warrant 25-24 (M) for the Subject Parcel. Eighteen bundles of various sizes concealing a white powdery substance, which field tested positive for Fentanyl and Cocaine and weighed approximately 4.655 kg, were seized.

8. On or about January 13, 2025, **VELEZ-LOARTE** arrived at the Fajardo Post Office to inquire about the status of the Subject Parcel. Subsequently, **VELEZ-LOARTE** filed a claim with the Fajardo Post Office regarding the Subject Parcel and left her contact information.

9. Between January 22 and January 23, 2025, your affiant and other Inspectors prepared for a controlled delivery operation of the Subject Parcel at the General Post Office, located at 585 FD Roosevelt Avenue, San Juan, PR 00936. On January 23, 2025, around 11:45 am, a Subject, later identified as **VELEZ-LOARTE**, arrived at the Customer Service counter and claimed the Subject Parcel. Upon receipt of the Subject Parcel, Postal Inspection Service personnel detained **VELEZ-LOARTE** as she exited the Post Office facility with the Subject Parcel.

10. Subsequently, Inspectors *Mirandized* **VELEZ-LOARTE** inside of an office space within the facility. Subsequently, Inspectors obtained written consent from **VELEZ-LOARTE** to search her mobile devices. **VELEZ-LOARTE**'s NuU phone (IMEI: 35452288102054) revealed WhatsApp messages with contact "David Mi Otro Hermano" (787-678-7327). The conversation with this contact showed images of USPS receipts and tracking information concerning the Subject Parcel. In a voice message, **VELEZ-LOARTE** stated concerning the Subject Parcel that she does not want to "have problems" and that "they are cracking down on that" ("*Le están dando duro a to' eso*"). When asked to explain what she meant, **VELEZ-LOARTE** stated that the Police in the Fajardo area were cracking down on drug trafficking. Furthermore, **VELEZ-LOARTE** stated in the same message that several parcels have not made it through ("*se han caído pal de cositas*"). Based on my training and

¹ The parcel's label was not readable because the ink was faded.

experience, I know that "*se han caído pal de cositas*" is slang used by drug trafficking organizations when Law Enforcement have intercepted contraband.

CONCLUSION

11. Between January 6 and January 23, 2025, the defendant herein did knowingly and intentionally, combine, conspire, and agree with others, known and unknown, to commit an offense against the United States, that is, to knowingly and intentionally possess with intent to distribute and distribute a detectable amount of a mixture and substance containing cocaine, a Schedule II, Narcotic Drug Controlled Substance, and 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (fentanyl), a Schedule II, Narcotic Drug Controlled Substance, all in violation of 21 U.S.C. §§ 841(a)(1) and 846.

12. Furthermore, between January 6 and January 23, 2025, the defendant did aid and abet in the manufacturing, distribution, or dispensing, or possession with intent to manufacture, distribute, or dispense, a controlled substance, specifically 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (fentanyl), a Schedule II, Narcotic Drug Controlled Substance, in violation of 21 U.S.C. § 841.

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13. Because this affidavit is submitted for the limited purpose of demonstrating probable cause, I have not included each and every fact observed by me or known to the government concerning this investigation. I have set forth only the facts believed necessary to establish probable cause that **VELEZ-LOARTE** committed violations of 21 U.S.C. §§ 841(a)(1) and 846.

I hereby declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.


Manuel Figueroa-Lopez
U.S Postal Inspector
U.S. Postal Inspection Service

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone AT 8:20 pm in San Juan, Puerto Rico, on January 23, 2025.



Hon. Giselle López-Soler
United States Magistrate Judge

Digitally signed by Hon.
Giselle López-Soler